

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	NO. 3:24-cr-169-2
v.)	
)	JUDGE RICHARDSON
[2] JEFFREY SCOTT WELLS)	
)	

UNITED STATES' UNOPPOSED MOTION
FOR A PROTECTIVE ORDER REGARDING DISCOVERY

Pursuant to Fed. R. Crim. P. 16(d)(1), the United States (the "Government") requests that this Court enter a protective order to protect the Government and Defendant, and his counsel and agents from claims of improper disclosure of confidential information. In support of this motion, the Government states:

1. On September 17, 2024, the United States Attorney filed a one-count Information, charging Defendant with conspiring to obstruct justice and commit perjury, in violation of 18 U.S.C. § 371.
2. The Government plans to produce in discovery, among other things, voluminous records which include sensitive information regarding third parties. These include documents with personally identifying information and confidential business records.
3. Due to the number of documents that contain confidential, private, or proprietary information and the number of places within those documents that the confidential, private, or proprietary information appears, it is not feasible to redact each instance of such information.
4. Based upon the foregoing, the Government seeks a protective order to allow the Government to disclose certain materials obtained in the investigation of Defendant; to prohibit

the unauthorized disclosure of discovery materials and any information contained therein to non-litigants; and to establish safeguards to ensure compliance with the terms of the protective order.

5. Undersigned counsel has conferred with defense counsel and he does not oppose the proposed order.

6. Accordingly, the Government respectfully requests that the Court enter the proposed protective order attached hereto.

Respectfully submitted,

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Attorney for the United States
Middle District of Tennessee
Acting Under Authority Conferred by
28 U.S.C. § 515

By:

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